

FOR THE DISTRICT OF DELAWARE

JAMES A. WILSON, et al.,)

Plaintiffs,)

V.)

C.A. No. 06-053-KAJ

HELEN LOHMAN, SCOTT MORGAN,
TOM CARVAN, JAY PLUMMER
and JOE FIELDS

Defendants.)

AFFIDAVIT OF PATRICIA S. DITTO

I, Patricia S. Ditto, having been duly sworn according to the law, do hereby
depose and state the following:

1. I am employed by the State of Delaware, Department of Correction at the Sussex Correctional Center ("SCC"), in Georgetown, Delaware as a Treatment Administrator. I have been employed by the Department of Correction for 23 ½ years. My duties include supervision of counseling staff, classification staff, recreation staff, law library staff and administrative specialists. I have held this position since January 1, 2000.

2. In response to a request from the State of Delaware Department of Justice, I have been asked to provide information regarding my professional knowledge of James Wilson's transfer to the Delaware Correctional Center ("DCC").

3. James Wilson is classified as a medium security inmate. The Merit Building houses both medium and minimum security inmates.

4. James Wilson was moved from the Merit building at SCI to the medium security building.

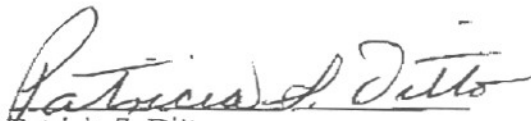
5. At the time of his transfer he had to leave his job as an educational assistant as he was no longer housed in the Merit building.

6. Inmate Wilson was offered the opportunity to either work in the kitchen at SCI or transfer to the Greentree program at the DCC. Inmate Wilson refused to choose. It was decided for him that he would be transferred to the Greentree program at DCC.


7. Inmate Wilson was transferred on June 5, 2006.

8. None of the defendants in this case have input into the classification or transfer decisions regarding inmate Wilson.

9. I have made these statements based upon my professional knowledge, specialized training, and experience as an employee of the Department of Correction.


Patricia S. Ditto

SWORN TO AND SUBSCRIBED BEFORE ME THIS 16th DAY OF Sept, 2006.


NOTARY

DONNA FUHRMAN
NOTARY PUBLIC, STATE OF DELAWARE
My Commission Expires September 4, 2007